

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

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| COMPEER FINANCIAL, PCA, PLAINTIFF, VS. SUNWOLD FARMS, INC., SUNTERRA FARMS IOWA, INC., AND LARIAGRA FARMS SOUTH, INC., DEFENDANTS. | CASE No. 25-cv-04044 AFFIDAVIT OF ANNA LIMOGES IN SUPPORT OF DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO AVOID MEDIATION AND DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR EX PARTE APPLICATION TO APPOINT A RECEIVER PURSUANT TO SDCL 21-21-6 |
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STATE OF SOUTH DAKOTA)
 : SS
COUNTY OF LINCOLN)

I, Anna Limoges, having been first duly sworn, deposes and states that I am one of the attorneys for Defendants Sunwold Farms, Inc., Sunterra Farms, Iowa, Inc., and Lariagra Farms South, Inc. ("Defendants"), in the above-entitled action, and I make this Affidavit in support of Defendants' Response to Plaintiff's Motion to Avoid Mediation and Defendant's Response to Plaintiff's Motion for Ex Parte Application to Appoint a Receiver Pursuant to SDCL 21-21-6.

1. Attached hereto as **Exhibit 1** are emails between Defendants and Plaintiff Compeer Financial, PCA.

2. Attached hereto as **Exhibit 2** is Plaintiff Compeer Financial, PCA's February 19, 2025 letter entitled "Notice of Your Right to Apply for Restructuring."

I declare under penalty of perjury under the law of South Dakota that the foregoing is true and correct.

Dated March 27, 2025, at Beresford, South Dakota.

HALBACH | SZWARC LAW FIRM

By:



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